

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION OF DAYTON

IN RE: : Case No. 06-32675

Thomas M. Trapp, : Chapter 13
Jennifer C. Trapp, Judge Humphrey
Debtor.

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APPLICATION FOR ADDITIONAL ATTORNEY FEES

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Now comes Attorney Michael J. Ellerbrock and applies to the Court for additional attorney fees as follows:

1. **Services Performed:** On the Motion for Stay Relief filed by JP Morgan Chase Bank on April 21, 2010.
2. **Result Obtained:** A withdrawal of the Motion filed by JP Morgan Chase Bank May 17, 2010.
3. **Time Spent:** 1.50 hours
4. No prior application has been made for the service for which this application is made.
5. **Date Work Performed:** 04/21/2010 through 05/17/2010
6. **Date Plan Confirmed:** February 11, 2007
7. **Original Percentage to Unsecured:** 4 %
8. **Date of Last Confirmed Modified Plan:** None
9. **Amount of Fee Requested:** \$ 200.00

/s/ *Michael J. Ellerbrock*
Michael J. Ellerbrock (0023289)
Attorney for Debtors
4403 N. Main Street
Dayton, Ohio 45405
(937) 275-0944
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NOTICE OF MOTION

Michael J. Ellerbrock, Attorney for Debtor, has filed an Application for Additional Attorney Fees for his work performed on the Motion for Stay Relief filed by JP Morgan Chase Bank on April 21, 2010, and subsequently the JP Morgan Chase Bank withdrew their Motion for Relief from Stay on May 17, 2010.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the fee sought in the Application for Additional Attorney Fees then on or before **twenty-one (21) days from the date set forth in the certificate of service for the Application**, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to U S Bankruptcy Court, Clerk's Office, 120 West Third Street, Dayton, Ohio 45402 or your attorney must file a response using the court's ECF System.

The court must **receive** your response on or before the date set in the Certificate of Service.

You must also send a copy of your response either by the court's ECF System or by Regular U.S. Mail to Michael J. Ellerbrock, Attorney at Law, 4403 North Main Street, Dayton, Ohio 45405 and to Jeffrey M. Kellner, Chapter 13 Trustee, 131 North Ludlow Street, #900, Dayton, Ohio 45402 and to the Office of the U S Trustee, 170 North High Street, #200, Columbus, Ohio 43215.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion/objection and may enter an order granting that relief without further hearing or notice.

CERTIFICATE OF SERVICE

A copy hereof was served on the following on 18th day of May, 2010, and to Jeffrey M. Kellner, Chapter 13 Trustee, and to the Office of the U S Trustee (by electronic filing) and to the debtor, Mr. & Mrs. Thomas Trapp, 2564 Acorn Drive, Dayton, Ohio 45419 on date of filing by ordinary U.S. Mail.

/s/ Michael J. Ellerbrock
Michael J. Ellerbrock (0023289)
Attorney at Debtor(s)